-against-	Plaintiff(s),	NOTICE OF ADOPTION BY CENTURY 21, INC. OF ANSWER TO MASTER
RAMIRO RAMIREZ,		08CV2694(AKH)
IN RE WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION		21MC102(AKH)
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YOR	K	<u> </u>

80 LAFAYETTE ASSOCIATES LLC, et al.,

Defendants.

COMPLAINT

PLEASE TAKE NOTICE that defendant CENTURY 21, INC. (hereinafter "Century 21") as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts Century 21's Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). CENTURY 21 has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

PLEASE TAKE FURTHER NOTICE THAT defendant, Century 21 reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (\P D(1)-(5)).

WHEREFORE, Century 21demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York April 24, 2008

HARRIS BEACH PLLC

Attorneys for Defendant CENTURY 21, INC.

 $/_{\rm S}/$

Stanley Goos, Esq. (SG 7062) 100 Wall Street, 23rd Floor New York, New York 10005 (212) 687-0100

TO:

Paul Napoli, Esq. Worby Groner Edelman & Napoli Bern LLP 115 Broadway, 12th Floor New York, New York 10006

Robert A. Grochow, Esq. Robert A. Grochow, P.C. 233 Broadway, 5th Floor New York, New York 10279

Gregory J. Cannata, Esq. Law Offices of Gregory J. Cannata 233 Broadway, 5th Floor New York, New York 10279 *Liaison Counsel for Plaintiff*

James E. Tyrrell, Esq.
Joseph Hopkins, Esq.
Patton Boggs LLP
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102

Liaison Counsel for the Defendants

All Counsel via ECF

CERTIFICATION AS TO SERVICE

The undersigned certifies that on April 24, 2008, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Century 21's Adoption of Answer to Master Complaint.

Dated: April 24, 2008

\frac{/s/}{Stanley Goos, Esq. (SG 7062)}